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# JEFFERSON TELEPHONE COMPANY

P.O. Box 269  
JEFFERSON, IOWA 50129

August 27, 1993

James Quellow, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20036

RE: Amendment of the Commission's Rules to Establish New  
Personal Communications Services, GEN Docket No. 90-334  
ET Docket No. 92-100

Dear Mr. Chairman:

It is our understanding that in a few weeks, the Federal Communications Commission will determine the frequencies and the market structure for personal communications services (PCS). One of the critical decisions the FCC will make is how to implement the goals of the recently enacted auction legislation to prescribe area designations and bandwidth assignments which promote economic opportunity for rural telephone companies and ensure that rural telephone companies are given the opportunity to participate in the provision of new spectrum-based services. The Jefferson Telephone Company is a small telephone company that serves Jefferson, Iowa, and the surrounding area. We have approximately 3,000 customers. We have been serving the communication needs of our customers for over 100 years.

Jefferson Telephone Company supports the right of small rural local telephone companies to provide personal communications services in the same geographic area in which they currently provide local exchange telephone service. Section 99.13 proposed in the Commission's Notice of Proposed Rulemaking and Tentative Decision released on August 14, 1992, in the above-captioned proceeding, would prohibit small local exchange carriers from providing personal communications services in their local exchanges. Jefferson Telephone Company believes that providing the personal communications services by rural telephone companies in the same geographic area where they provide local exchange telephone service is critical to their economic viability and the rapid deployment of new technologies, products and services the public residing in rural areas. Jefferson Telephone Company believes this new technology may be the technology of choice for us

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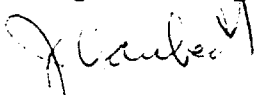
to serve our existing customer base for basic telephone service. If we do not have access to this technology we could be severely handicapped in our continuing ability to serve as a telephone company.

The awarding of a national license to a national consortium consisting of at least 100 companies will help achieve Congress' goal of ensuring the opportunity for rural telephone companies to participate in the provision of new spectrum-based personal communications services. Jefferson Telephone Company supports the eligibility requirements proposed by MCI for such a national PCS license. From an Iowa perspective, a national license awarded to a national consortium consisting of at least 100 companies would ensure the rapid deployment of this new technology to our state's rural areas. Such a national license not only provides for nationwide coverage and compatibility, it provides as well for the economies of scale which will permit the fullest range of features and network functions to be offered at the lowest cost to rural communities.

In order to pursue these goals, Jefferson Telephone Company has joined the MCI national PCS consortium. We believe the consortium approach combined with the national license ensures the realization of the important goals for PCS licensing set forth by Congress in the recently enacted auction legislation and reconciliation package. Our consortium will stress local ownership and management in each market and provides inclusion of small businesses, minority and female-owned businesses as well as rural interests.

A national license for a national consortium consisting of at least 100 companies promises enormous opportunities and rewards. The economic opportunities for rural communities will be significantly enhanced by making it possible for rural telephone companies to offer this new technology in their rural exchanges. We hope that you give our proposals full consideration in your deliberations, as we stand ready to bring innovative, personal communications services to rural America.

Respectfully submitted,



Jim Daubendiek  
General Manager

cc: Commissioner Ervin Duggan  
Commissioner Andrew Barrett  
Thomas Stanley, Chief Engineer, Office  
of Engineering and Technology